

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

DR. ROBERT W. MALONE,

Plaintiff,

v.

PETER R. BREGGIN, MD,
GINGER ROSS BREGGIN,
AMERICA OUT LOUD,
DR. JANE RUBY

-and-

RED VOICE MEDIA,

Defendants.

Case No. 3:22-cv-63

**DECLARATION OF DR. JANE RUBY IN SUPPORT OF HER
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Dr. Jane Ruby, declare as follows:

1. I am over eighteen years of age and I am otherwise competent to make this declaration. I have personal knowledge of the facts contained herein.
2. My name is Jane Ruby. I am a resident of the State of Florida and have been since 2020.
3. I do not reside in Virginia. I have not visited Virginia since 2020. I do not do business in Virginia. I do not specifically reach into Virginia or otherwise solicit business from Virginia. I have no offices in Virginia, no bank accounts, property, assets, or other interests in Virginia. I have no business, interests, or specific commerce emanating from or directed specifically into Virginia. I have no employees or agents in Virginia. There are no relevant or

applicable contracts executed or to be performed in Virginia. I have made no in-person contacts with Virginia since 2020.

4. I am a current affairs and political commentator. I host an internet show called the Dr. Jane Ruby Show. The show is available worldwide on the internet. It is available for viewing by persons in places like Africa, Australia, and Russia. I discuss topics such as pharmaceutical drugs, regulatory processes, and other health-related topics. I do not charge subscribers to watch the show. I also have social media accounts on Telegram, Twitter, Gettr, Gab, TruthSocial and CloutHub. I post on these platforms from Florida.

5. I do not know how many subscribers, followers, or fans I have in Virginia. I do not solicit or target Virginians as consumers separate from a worldwide audience. I am not paid by subscribers anywhere. Viewers may access and subscribe to my Telegram and Gab accounts (for free) from locations around the world. I was unaware, prior to this lawsuit, that Dr. Malone lived in Virginia. I did not specifically communicate with Dr. Malone in Virginia.

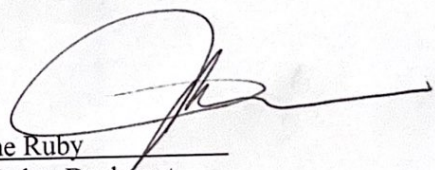
6. yourNEWS is a news content distribution platform with a monetization model for news reporters and audio and video content creators whereby the content creators submit the content through a form on the yourNEWS website. The content creator does not select the methods or location of distribution nor the locale in which the information will be published. The content submitted is distributed by the yourNEWS editor without input by the content creator. I submit content through the yourNEWS platform. However, I did not select, urge, opine, or otherwise intend to distribute any content on yourNEWS in or to Virginia or any particular state. The content I upload is national or global in nature and my aim is and was to have my content uploaded for distribution wherever the yourNEWS editor selects. I did not intend, did not ask for, and did not

know that any information that I uploaded was selected for print in the Charlottesville edition of yourNEWS. In fact, I do not know if that is even true.

7. None of the statements at issue in this case were directed at a Virginia audience, I did not address Virginia-specific issues, and I had no intention of binding myself to the laws of Virginia in speaking on the COVID-19 pandemic, its vaccines, or COVID-related issues.

8. It would be a tremendous burden for me to litigate in Virginia, as I maintain no connection to the State. I reside and work from Florida and have not taken any action to submit myself to the laws of Virginia for this matter. None of the statements were made on a Virginia server, they were not made within Virginia, and I did not intend to communicate any of the statements specifically into Virginia apart from my intention to reach a global audience that views my internet show and social media platforms from wherever that audience is located.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed July 19, 2023 In West Palm Beach, Florida.



/s/ Dr. Jane Ruby

Dr. Jane Ruby, Declarant